ENFORCEMENT 1/29/05 SENSITIVE He -> SENSITIVE RCRA Inspection Summary

EPA Region 10

Inspec	ction Information
Site Name Flint Hills Resources Alaska	RCRA ID No. AKD 000850701
Type of Inspection CEI	Inspection Date June 17, 2005
☐ Inspection Summary Only	X Inspection Report Attached
☐ ICDS Form Attached Previously submitted	
	mendations sheet if necessary)
1 (a). Violations and citations	
,	
1 (b). Issues/concerns/comments	
	04 and the report was not finalized until August 2005. The ewed in a subsequent inspection at the facility. No further
2. Recommended Enforcement Follow-up (check al □ No Action letter □ 3007 □ Formal Enforcement □ Criminal X Other Action: Recommend for inspection in I report.	ll that apply) ☐ Referral to State ☐ NOV ☐ DOJ FYI 2006 to verify corrections to observation noted in this
3. SNC Recommendation (circle choice) Yes	<u>No</u>
PRINT Inspector Name Bruce Long	Inspector Signature Date Signed August 30, 2005
Management I	Decision/ Comments
Manager's Decision ☐ This handler is <u>not</u> a SNC ☐ Send to File no further action necessary ☐ Compliance Analysis Assignment to: Manager's Comments ☐ I'a form HQ	a au way a Rema inspection
STATUS - STALL QUE HAN	bu and by 12/105
Manager's Signature Butty Huic	Date 11/29/05

Enforcement Confidential Do NOT Release under FOIA **Enforcement Confidential** Do NOT Release under FOIA **Enforcement Confidential** Do NOT Release under FOIA

EPA Region 10 RCRA Compliance Inspection Report Section A

Inspection Information

Handler Name: Flint Hills Resources Alaska North Pole Refinery

Handler ID Number: AKD 00085 0701

Inspection Date: June 17, 2004

Inspection Type: CEI

Inspection Team: Diane Richardson, USEPA Alaska Operations Office

and Bruce Long, USEPA Oregon Operations Office

Site Contact Information

Site Contact Name/Title: David Guinn, Environmental Manager

Site Location Address: 1100 H & H Lane North Pole, AK 99705

Site Mailing Address: 1100 H & H Lane North Pole, AK 99705

Site Phone Number: (907) 488-0033

Site Fax Number:

Report Information

Report Start Date: September 30, 3005

Date Report Completed: August 30, 3005

Report Author Name (print): Bruce Long

Report Author Signature:

September 29, 2005 - 4:38 PM

EPA Region 10 Extract Flag: X Facili	RESOUR	RCES NORT	AIRBANKS I			表。自他的		
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Generator: LQG Operating TSDF BOYSNC: Transporter: SNC: Annual BOY Enf	:	Subj CA: Subj CA TSE Subj CA TSE Subj CA Non CA Wrkld:	Discr: X	Pe Cl Pc	erm Prgrs: erm Wrkld: os Wrkld: clos Wrkld: ontrols in Place:	LS- : No	PCIO CA (CA I	Pmt GPRA: os GPRA: GPRA: HE EI: GW EI:
Activity Location: AK Source Type: Notifi	ication	Seq. Number:	4	Receive	Date: 01 APF	2004		
Other/Previous Site Name: FLINT HILLS RESOUR	CES NORTH	POLE REFINRY						
Location 1100 H & H LN Address: NORTH POLE, AK 99705			Mailing Address:		& H LN POLE, AK 9970 STATES	05		
Contact Person BRIAN K. ROOS For Source (907) 488-0033 Information BRIAN.ROOS@FHR.COM	NC	00 H & H LN DRTH POLE, AK 9 NITED STATES	99705					
Owner (current) FLINT HILLS RESOURCES ALASKA LLC From: 04/01/2004 To:	NO	0 H & H LANE RTH POLE, AK 99 RTH POLE	9705		7.550	/pe: Pri none:	ivate	
Owner (current) WILLIAMS ALASKA PETROLEUM INC From: 08/18/1977 To: 04/01/2004	NO	0 H & H LN RTH POLE, AK 99 RTH POLE	9705			S	ivate 07) 488-274	1
Operator (current) FLINT HILLS RESOURCES ALASKA LLC From: 04/01/2004 To:	3	THE RESERVE THE PROPERTY OF TH			n 20	/pe: Pri	ivate	-
and Type: State Non Notifier:	No	Comm	ercial Availab	ility: Unkr	nown		Tsd Date	
NAICS Codes: 32411 Petroleum Refineries Notes: 1/99 NAME CHANGE. SBS ORIGINAL SH	OWED TSD	INDICATOR BUT			T. POSSIBLE F			
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NAICS Codes: 32411 Petroleum Refineries Notes: 1/99 NAME CHANGE. SBS ORIGINAL SHI NOW. SBS WASTE CODES K169 & WT02. 1999 SITE & CONTACT DUE TO CHANGE OF OWNER Regulated Waste Activities Hazardous Waste Generator Status - Federal: Lai Transfer Facility: Other Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: Transporter Activity: Recycler Activity: Exempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption: Smelting, meiting, Refining Furnace Exemption: Description of Hazardous Wastes (as reported on S	OWED TSD BRS LQG. SESHIP PER L	INDICATOR BUT BS 7/5/00. 2001 TR 4/17/04. OSE Generator; State: Used Oil Activ Used Oil Transporte Transfer F Used Oil Proc Re-refiner Act Processor Refiner: Underground Injection Contro	1/99 FORM DBRS LQG, Ot 4/23/04. AK-1 large quities sporter Activity er: acility: essor and/or ivity :	vantity ge No No Yes No D035, D0	Off-Specifica Used Oil Fue Marketer off-specif off-specifica Marketer oil meets Destination Universal W	ation Used I Marketer who direction use the spectrum who first the spectrum Facility for Vaste:	d Oil Burner: er Activity cts shipmented oil to sed oil burner claims the u ifications:	t sed
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For Source

Information

(907) 488-0033 KATHLEEN.MCCULLOM@WILLIAMS.COM

NORTH POLE, AK 99705 UNITED STATES

September 29, 2005 - 4:38 PM

FLINT HILLS RESOURCES NORTH POLE REFINRY AKD000850701 Continued... Owner (current) 1100 H & H L N Type: Private WILLIAMS ALASKA PETROLEUM INC NORTH POLE, AK 99705 Phone: (907) 488-2741 From: 08/18/1977 To: Land Type: Non Notifier: State No Commercial Availability: Unknown Tsd Date: Accessibility: No. Employees: 0 State District: NAICS Codes: 32411 Petroleum Refineries Notes: 1/99 NAME CHANGE. SBS ORIGINAL SHOWED TSD INDICATOR BUT 1/99 FORM DOES NOT. POSSIBLE FORMER STORAGE SITE; CLOSED NOW. SBS WASTE CODES K169 & WT02. 1999 BRS LQG. SBS 7/5/00. 2001 BRS LQG, OSE 12/13/01. 2003 BR LQG, OSE 4/23/04. Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: AK-1 large quantity generator Transfer Facility: **Used Oil Activities** Other Hazardous Waste Generator Activities Used Oil Transporter Activity Off-Specification Used Oil Burner: No Importer Activity: No Transporter: No Used Oil Fuel Marketer Activity Mixed Waste Generator: Transfer Facility: No No Marketer who directs shipment Transporter Activity: No Used Oil Processor and/or off-specification used oil to Re-refiner Activity off-specification used oil burner: TSD Activity: No No Recycler Activity: No Processor: No Marketer who first claims the used Refiner: Yes oil meets the specifications: Exempt Boiler and/or Industrial Furnace No Small Quantity Onsite Burner Exemption: No Destination Facility for Underground Smelting, melting, Refining Furnace Injection Control: Exemption: No Universal Waste: No No Description of Hazardous Wastes (as reported on Site Identification Form) EPA Waste Codes: D001, D002, D003, D004, D006, D007, D008, D009, D010, D011, D018, D035, D039, D040, F002, F003, F005, F037, K050, K169 Activity Location: AK Source Type: Biennial Report Seq. Number: 6 Receive Date: 27 FEB 2004 Report Cycle: 2003 Other/Previous Site Name: WILLIAMS ALASKA PETROLEUM N POLE REFINER 1100 H & H LN Location Mailing 1100 H & H LN Address: NORTH POLE, AK 99705 Address: NORTH POLE, AK 99705 UNITED STATES **Contact Person** KATHLEEN M. MCCULLOM **UNITED STATES** For Source (907) 488-0033 KATHLEEN.MCCULLOM@WILLIAMS.COM Information Owner (current) 1100 H & H LN Type: State STATE OF ALASKA NORTH POLE, AK 99705 Phone: From: 08/18/1977 NORTH POLE Operator (current) Type: Private WILLIAMS ALASKA PETROLEUM, INC. Phone: From: 08/18/1977 To: Land Type: State Non Notifier: No Commercial Availability: Unknown Tsd Date: Accessibility: No. Employees: State District: NAICS Codes: 32411 Petroleum Refineries

1

EPA Waste Codes: D018

0

Report run on:

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FLINT HILLS RESOURCES NORTH POLE REFINRY AKD000850701 Continued... Regulated Waste Activities Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: AK-1 large quantity generator Transfer Facility: **Used Oil Activities** Other Hazardous Waste Generator Activities Used Oil Transporter Activity Off-Specification Used Oil Burner: No Importer Activity: No Transporter: No Used Oil Fuel Marketer Activity Mixed Waste Generator: No Transfer Facility: No Marketer who directs shipment Transporter Activity: No Used Oil Processor and/or off-specification used oil to TSD Activity: Re-refiner Activity off-specification used oil burner: No No Recycler Activity: No Processor: No Marketer who first claims the used Refiner: Yes oil meets the specifications: Exempt Boiler and/or Industrial Furnace No Small Quantity Onsite Burner Exemption: No Underground Destination Facility for Smelting, melting, Refining Furnace Injection Control: Universal Waste: No No Exemption: No Universal Waste Activities: Description Generated Accumulated Batteries amps N N Pesticides N N Thermostats N N Description of Hazardous Wastes (as reported on Site Identification Form) EPA Waste Codes: D001, D002, D003, D004, D006, D007, D008, D009, D010, D011, D018, D035, D039, D040, F002, F003, F005, F037, K050, K169 **Biennial Report Information** Total Quantity Reported (Tons): Generated: 43 Managed: 0 Shipped: 43 Received: 0 Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (Ali quantities are in tons) Generated Managed **Onsite Management Methods** Shipped Offsite Management Methods SULFOLANE WITH BENZENE 9 9 H061 - FUEL BLENDING EPA Waste Codes: D018 OIL/WATER/SOLIDS SEPARATOR SLUDGE 5 0 5 H040 - INCINERATION EPA Waste Codes: F037 K050 - CONTAMINATED DEBRIS 3 0 3 H040 - INCINERATION H132 - LANDFILL OR SURFACE IMPOUNDMENT EPA Waste Codes: K050 SPENT FILTERS CONTAMINATED WITH BENZENE 2 0 2 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE EPA Waste Codes: D018 ACTIVATED CARBON POWDER FROM AIR POLLUTION CONTROL DEVICE 2 0 2 H061 - FUEL BLENDING EPA Waste Codes: D001, D018 FLOATING ROOF SEAL FROM PETROLEUM TANK 2 2 H040 - INCINERATION EPA Waste Codes: D001, D018 MISCELLANEOUS REFINERY SLUDGES FROM MAINTENANCE ACTIVITIES 2 0 2 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE EPA Waste Codes: D018, F037, K050 ETHYLENE GLYCOL W/ BENZENE FROM AIR POLLUTION CONTROL DEVICE 2 H061 - FUEL BLENDING EPA Waste Codes: D018 PROPYLENE GLYCOL SLUDGE (SOLIDS FROM FILTERING GLYCOL)

1 H040 - INCINERATION

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FLINT HILLS RESOURCES NORTH POLE REFINRY AKD000850701

Continued...

Top 10 GM Forms Summary - continued (All quantities are in tons)

0

Generated

Managed

Onsite Management Methods

Shipped

Offsite Management Methods

SLUDGE WITH BENZENE FROM UNLISTED SOURCES AND PROCESSES

1 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE

EPA Waste Codes: D018 Activity Location: AK Source Type: Notification Seq. Number: 2 Receive Date: 11 DEC 2001 Other/Previous Site Name: WILLIAMS ALASKA PETROLEUM N POLE REFINER 1100 H & H L N Mailing 1100 H & H LN Location NORTH POLE, AK 99705 Address: Address: NORTH POLE, AK 99705 **Contact Person** KATHLEEN MCCULLOM 1100 H & H LN (907) 488-0033 For Source NORTH POLE, AK 99705 Information Owner (current) 1100 H & H LN Type: Private WILLIAMS ALASKA PETROLEUM INC NORTH POLE, AK 99705 Phone: (907) 488-2741 From: 08/18/1977 Land Type: State Non Notifier: No Commercial Availability: Other - U Tsd Date: Accessibility: No. Employees: State District: Notes: 1/99 NAME CHANGE. SBS ORIGINAL SHOWED TSD INDICATOR BUT 1/99 FORM DOES NOT. POSSIBLE FORMER STORAGE SITE: CLOSED NOW. SBS WASTE CODES K169 & WT02. 1999 BRS LQG. SBS 7/5/00. 2001 BRS LQG, OSE 12/13/01 Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: Transfer Facility: Unknown **Used Oil Activities** Other Hazardous Waste Generator Activities Used Oil Transporter Activity Off-Specification Used Oil Burner: No Importer Activity: Unknown Transporter: No Used Oil Fuel Marketer Activity Mixed Waste Generator: Unknown Transfer Facility: No Marketer who directs shipment Transporter Activity: No Used Oil Processor and/or off-specification used oil to Re-refiner Activity off-specification used oil burner: TSD Activity: No No Recycler Activity: No Processor: No Marketer who first claims the used Refiner:

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace

Unknown Unknown

Report Cycle: 2001

No

Exemption:

Underground Injection Control: Yes oil meets the specifications:

Destination Facility for

Universal Waste:

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D001, D002, D003, D006, D007, D008, D009, D011, D018, D035, D039, D040, F003, F005, F037, K050, K169

Activity Location: AK Source Type: Biennial Report Seq. Number: 5 Other/Previous Site Name: WILLIAMS ALASKA PETROLEUM N POLE REFINER

Location Address:

1100 H & H LN NORTH POLE

NORTH POLE, AK 99705

Mailing

Address:

No

1100 H & H LN

Receive Date: 29 NOV 2001

NORTH POLE, AK 99705

UNITED STATES

Contact Person For Source Information

KATHLEEN M. MCCULLOM

(907) 488-0033

UNITED STATES

Owner (current)

WILLIAMS ALASKA PETROLEUM, INC

From:

Type: Private

Phone:

Operator (current)

WILLIAMS ALASKA PETROLEUM, INC

From:

To:

Type: Private

Phone:

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0

EPA Waste Codes: D018

FLINT HILLS RESOURCES NORTH POLE REFINRY AKD000850701 Continued... Land Type: State Non Notifier: Commercial Availability: Unknown Tsd Date: No Accessibility: No. Employees: 0 State District: NAICS Codes: 32411 Petroleum Refineries Regulated Waste Activities Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: AK-1 large quantity generator Transfer Facility: **Used Oil Activities** Other Hazardous Waste Generator Activities Used Oil Transporter Activity Off-Specification Used Oil Burner: Unknown Importer Activity: No Transporter: Unknown Used Oil Fuel Marketer Activity Mixed Waste Generator: Transfer Facility: No Unknown Marketer who directs shipment Transporter Activity: Unknown Used Oil Processor and/or off-specification used oil to Re-refiner Activity off-specification used oil burner: TSD Activity: No Unknown Recycler Activity: Unknown Processor: Unknown Marketer who first claims the used Refiner: Yes oil meets the specifications: Exempt Boiler and/or Industrial Furnace Unknown Small Quantity Onsite Burner Exemption: Unknown Destination Facility for Underground Smelting, melting, Refining Furnace Injection Control: Universal Waste: Unknown Exemption: Unknown Unknown **Universal Waste Activities:** Description Accumulated Generated Batteries U 11 Lamps U U Pesticides U U Thermostats U U Description of Hazardous Wastes (as reported on Site Identification Form) EPA Waste Codes: D001, D002, D003, D006, D007, D008, D009, D011, D018, D035, D039, D040, F003, F005, K050, K169 **Biennial Report Information** Total Quantity Reported (Tons): Generated: 130 Managed: 0 Shipped: 130 Received: 0 Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons) Generated Managed **Onsite Management Methods** Shipped Offsite Management Methods HEAT EXCHANGER SLUDGE 33 0 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE EPA Waste Codes: K050 SULFOLANE WITH BENZENE 20 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE EPA Waste Codes: D018 SLUDGE WITH CHROMIUM 12 0 12 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE EPA Waste Codes: D007 GRAVEL CONTAMINATED WITH HEAT EXCHANGER SLUDGE H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE EPA Waste Codes: K050 SOIL/ROCKS/SAND WITH SULFOLANE AND BENZENE 6 6 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE EPA Waste Codes: D018 PPE CONTAMINATED WITH HEAT EXCHANGER SLUDGE 4 H141 - STORAGE, BULKING AND/OR 0 TRANSFER OFF SITE EPA Waste Codes: K050 SLUDGE WITH BENZENE

1 H141 - STORAGE, BULKING AND/OR

TRANSFER OFF SITE

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FLINT HILLS RESOURCES NORTH POLE REFINRY AKD000850701

Continued...

Top 10 GM Forms Summary - continued (All quantities are in tons) Managed **Onsite Management Methods** Shipped Offsite Management Methods PPE CONTAMINATED WITH OIL/WATER/SOLIDS SEPARATOR SLUDGE 0 1 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE EPA Waste Codes: F037 USED KEROSENE SOLVENT H061 - FUEL BLENDING EPA Waste Codes: D008, D018 PROPYLENE GLYCOL SLUDGE 0 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE

EPA Waste Codes: D018 Activity Location: AK Source Type: Biennial Report Seq. Number: 4 Receive Date: 02 NOV 1999 Report Cycle: 1999 Other/Previous Site Name: WILLIAMS ALASKA PETROLEUM NORTH POLE Location 1100 H & H LANE Mailing 1100 H & H LANE NORTH POLE, AK 99705 Address: Address: NORTH POLE, AK 99705 **Contact Person** KATHLEEN M MCCULLOM For Source (907) 488-0033 Information Land Type: Bad code - U Non Notifier: No Commercial Availability: Other - U Tsd Date: No. Employees: Accessibility: State District: NAICS Codes: 32411 Petroleum Refineries Regulated Waste Activities Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: Transfer Facility: Unknown **Used Oil Activities** Other Hazardous Waste Generator Activities Used Oil Transporter Activity Off-Specification Used Oil Burner: Unknown Importer Activity: Unknown Transporter: Unknown Used Oil Fuel Marketer Activity Mixed Waste Generator: Unknown Transfer Facility: Unknown Marketer who directs shipment Transporter Activity: Unknown Used Oil Processor and/or off-specification used oil to Re-refiner Activity TSD Activity: off-specification used oil burner: No Unknown Recycler Activity: Unknown Processor: Unknown Marketer who first claims the used Refiner: Unknown oil meets the specifications: Unknown Exempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption: Unknown Underground Destination Facility for Smelting, melting, Refining Furnace Injection Control: Universal Waste: Exemption: Unknown Unknown Unknown **Biennial Report Information** Total Quantity Reported (Tons): Generated: 119,022 Managed: 610,285 Shipped: 13 Received: 0 Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons) Generated Managed **Onsite Management Methods** Shipped Offsite Management Methods OILY WATER, SEPARATOR SLUDGE 4 H040 - INCINERATION H050 - ENERGY RECOVERY EPA Waste Codes: D001, F037

OILY WATER, SEPARATOR SLUDGE WITH REGULATED SULFIDES 2 2 H040 - INCINERATION EPA Waste Codes: D001, D003, F037 SULFOLANE WITH BENZENE 2 0 2 H050 - ENERGY RECOVERY EPA Waste Codes: D018

September 29, 2005 - 4:38 PM

AKD000850701 FLINT HILLS RESOURCES NORTH POLE REFINRY

Continued...

Generated Managed		are in tons)				
		t Methods		Shipped	Offsite Management Methods	
PETROLEUM REFINERY HEA						
2	0			1	2 H040 - INCINERATION	
EPA Waste Codes: K050	O MUTILIA EDOLINA					HENDER CO.
FLOURESCENT LIGHT TUBES 1	S WITH MERCURY				H132 - LANDFILL OR SURFACE	
	•				IMPOUNDMENT	
EPA Waste Codes: D009						
SLUDGE WITH BENZENE				A44		
1	0			34	H040 - INCINERATION	
EPA Waste Codes: D018						
USED KEROSENE (USED FOR	R WASHING PARTS)					
0	0			(H050 - ENERGY RECOVERY	
EPA Waste Codes: D008, D0						
USED PETROLEUM COALESC						
0	0				H040 - INCINERATION	
EPA Waste Codes: D018	IFAT EVOLUNIOED OUT A		CV the street was a	ACT AND A PARTY OF THE PARTY OF		
PPE CONTAMINATED WITH H 0	HEAT EXCHANGER SLUDG 0				HOMO INCINEDATION	
EPA Waste Codes: K050					H040 - INCINERATION	
FILTERS CONTAMINATED WI	ITH WASTE SHI FOL AND O	DENZENE				
	0	DENZENE		(H040 - INCINERATION	
EPA Waste Codes: D018					TIOTO INCINEITATION	
				Charles Santa		
activity Location: AK Sou	rce Type: Notification	Seq. Number:	1	Receive Da	te: 12 FEB 1999	
her/Previous Site Name: WILLI	AMS ALASKA PETROLEUM	N POLE REFINE	R	J A MES	As sound to the second of	
ocation 1100 H & H LN		- 4	Mailing	1100 H & H	LN	
Address: NORTH POLE, AK	99705		Address:		E, AK 99705	
			- Santa Caraca C			
nd Type: State	Non Notifier: No.	Comp	nercial Availabi	lity: Other-I	Ted Date:	
	Non Notifier: No		nercial Availabi	ility: Other - U	J Tsd Date:	
and Type: State	Non Notifier: No No. Employees:		nercial Availabi District:	ility: Other - L	J Tsd Date:	
ccessibility: otes: 1/99 NAME CHANGE, SB OW, SBS WASTE CODES K16	No. Employees:	State	District:	OES NOT. P	J Tsd Date: OSSIBLE FORMER STORAGE SITE; CL	LOSED
ccessibility: otes: 1/99 NAME CHANGE. SB OW. SBS WASTE CODES K16 Regulated Waste Activities	No. Employees: 3S ORIGINAL SHOWED TSE 59 & WT02. 1999 BRS LQG.	State D INDICATOR BUT SBS 7/5/00. 2001	District: 1/99 FORM D BRS LQG, OS	OES NOT. P		LOSED
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H111 - STABILIZATION OR CHEMICAL

FIXATION

Report run on:

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FLUORESCENT LIGHT TUBES W/ MERCURY.

EPA Waste Codes: D009

0

AKD000850701 FLINT HILLS RESOURCES NORTH POLE REFINRY Continued... **Contact Person** KATHLEEN MCCULLOM For Source (907) 488-0033 Information Land Type: Bad code - U Non Notifier: No Commercial Availability: Other - U Tsd Date: Accessibility: No. Employees: State District: NAICS Codes: 32411 Petroleum Refineries Regulated Waste Activities Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: Transfer Facility: Unknown **Used Oil Activities** Other Hazardous Waste Generator Activities Used Oil Transporter Activity Off-Specification Used Oil Burner: Unknown Importer Activity: Unknown Transporter: Unknown Used Oil Fuel Marketer Activity Mixed Waste Generator: Unknown Transfer Facility: Unknown Marketer who directs shipment Transporter Activity: Unknown Used Oil Processor and/or off-specification used oil to Re-refiner Activity off-specification used oil burner: TSD Activity: No Unknown Recycler Activity: Unknown Processor: Unknown Marketer who first claims the used Refiner: Unknown oil meets the specifications: Exempt Boiler and/or Industrial Furnace Unknown Small Quantity Onsite Burner Exemption: Unknown Underground Destination Facility for Smelting, melting, Refining Furnace Injection Control: Universal Waste: Unknown Exemption: Unknown Unknown **Biennial Report Information** Total Quantity Reported (Tons): Generated: 43 Managed: 0 Shipped: 43 Received: 0 Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons) Generated Managed **Onsite Management Methods** Shipped Offsite Management Methods OILY WATER SEPARATOR SLUDGE W/BENZENE, REACTIVE SULFIDES 17 17 H040 - INCINERATION EPA Waste Codes: D001, D003, D018, F037 TANK SLUDGE W/ BENZENE 3 H040 - INCINERATION EPA Waste Codes: D018 USED GASOLINE COALESCING FILTER W/ BENZENE. 0 H040 - INCINERATION EPA Waste Codes: D018 ABSORBENT, PPE W/HEAT EXCHANGER BUNDLE SLUDGE 1 H040 - INCINERATION EPA Waste Codes: K050 USED PARTS WASHER KEROSENE W/ LEAD & BENZENE 0 H050 - ENERGY RECOVERY H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE EPA Waste Codes: D008, D018 FILTERS CONTAMINATED W/ WASTE SULFOLANE & BENZENE 1 H040 - INCINERATION 0 EPA Waste Codes: D018 SULFOLANE CONTAMINATED W/ BENZENE 0 0 H040 - INCINERATION H050 - ENERGY RECOVERY **EPA Waste Codes: D018** SORBENT PADS CONTAMINATED W/ FUELS & BENZENE 0 H040 - INCINERATION 0 EPA Waste Codes: D018

RCRA Site Detail

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AKD000850701 FLINT HILLS RESOURCES NORTH POLE REFINRY

Continued...

LAB PACK

0

EPA Waste Codes: D006, D007, D009

Top 10 GM Forms Summary - continued (All quantities are in tons) Generated Managed **Onsite Management Methods** Shipped Offsite Management Methods SANDBLAST MEDIA CONTAMINATED W/ CADMIUM & LEAD H111 - STABILIZATION OR CHEMICAL FIXATION EPA Waste Codes: D006, D008 Activity Location: AK Source Type: Biennial Report Seq. Number: 2 Receive Date: 21 FEB 1996 Report Cycle: 1995 Other/Previous Site Name: MAPCO ALASKA PETROLEUM INC, NORTH POLE Location 1100 H&H LANE Mailing 1100 H&H LANE Address: NORTH POLE, AK 99705 Address: NORTH POLE, AK 99705 **Contact Person** JOHN A HELLEN For Source (907) 488-5158 Information Land Type: Bad code - U Non Notifier: Commercial Availability: Other - U Tsd Date: No Accessibility: No. Employees: State District: NAICS Codes: 32411 Petroleum Refineries Regulated Waste Activities Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: Transfer Facility: Unknown **Used Oil Activities** Other Hazardous Waste Generator Activities Used Oil Transporter Activity Off-Specification Used Oil Burner: Unknown Importer Activity: Unknown Transporter: Unknown Used Oil Fuel Marketer Activity Mixed Waste Generator: Unknown Transfer Facility: Unknown Marketer who directs shipment Transporter Activity: Used Oil Processor and/or Unknown off-specification used oil to Re-refiner Activity off-specification used oil burner: TSD Activity: No Unknown Recycler Activity: Unknown Processor: Unknown Marketer who first claims the used Refiner: Unknown oil meets the specifications: Unknown Exempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption: Unknown Underground Destination Facility for Smelting, melting, Refining Furnace Universal Waste: Injection Control: Unknown Exemption: Unknown Unknown **Biennial Report Information** Total Quantity Reported (Tons): Generated: 62 Managed: 0 Shipped: 63 Received: 0 Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons) Generated Managed Onsite Management Methods Shipped Offsite Management Methods DESALTER SLUDGE 7 0 7 H061 - FUEL BLENDING EPA Waste Codes: D018 **USED PETROLEUM FILTERS** H040 - INCINERATION EPA Waste Codes: D018 ASH FROM HEATER CLEANING, CHROMIUM H111 - STABILIZATION OR CHEMICAL **FIXATION EPA Waste Codes:** D007 HEAT EXCHANGER BUNDLE SLUDGE 0 n 1 H040 - INCINERATION EPA Waste Codes: K050

0 H129 - OTHER TREATMENT

EPA Waste Codes: D018

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AKD000850701 FLINT HILLS RESOURCES NORTH POLE REFINRY

Continued...

Generated Managed Ons	We will be the control of the control of the	re in tons)	***************************************	(1349) ····	COLOR DEPARTMENT OF THE PROPERTY OF THE PROPER	
FUEL TANK CLEANING SLUDGE	ite Management	Methods	Shipp	ed C	Offsite Management Methods	
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EPA Waste Codes: D018				0 11	040 - INGINERATION	
USED SANDBLASTING MEDIA			WAR DESCRIPTION OF THE			
0 0				0 H	111 - STABILIZATION OR CHEMI	CAL
					XATION	
EPA Waste Codes: D006, D008						
IGNITABLE WASTE SOLVENT FROM EQU	JIPMENT CLEAN	ING; MIXTURE OFTO	DLUENE AND ME			
0 0				0 H	061 - FUEL BLENDING	
EPA Waste Codes: D001, D035, F005						
SPENT SULFOLANE 0 0						
				U H	061 - FUEL BLENDING	
EPA Waste Codes: D018	THE MADUTHAL					
SPENT PAINT THINNER; XYLENE, TOLUM	ENE, NAPHTHAL	ENES, PARAFFINS		0 14	064 FUEL DI ENDING	
EPA Waste Codes: D001, F003, F005				U H	061 - FUEL BLENDING	
EFA Waste Codes. Doo1, Foos, Foos						
Activity Location: AK Source Type:	Biennial Report	Seq. Number: 1	Rece	ive Date:	23 FEB 1994 Report Cycle	e: 1993
Other/Previous Site Name: MAPCO ALASKA	PETROLEUM INC	C, NORTH POLE				
Location 1100 H&H LANE			Mailing 1100	H&H LANE		
Address: NORTH POLE, AK 99705		10.00		TH POLE, A		
or Source (907) 488-0033 formation						
and Type: Bad code - U Non No ccessibility: No. Em IAICS Codes: 32411 Petroleum Refine	ployees:	Commerci State Dist	ial Availability: O	Other - U	Tsd Date:	
and Type: Bad code - U Non No accessibility: No. Em IAICS Codes: 32411 Petroleum Refine Regulated Waste Activities	ployees: eries	State Dist	- T.	Other - U	Tsd Date:	
and Type: Bad code - U Non No accessibility: No. Em IAICS Codes: 32411 Petroleum Refine Regulated Waste Activities lazardous Waste Generator Status - Federa	ployees: eries	State Dist	rict:	Other - U	Tsd Date:	
and Type: Bad code - U Non	ployees: eries al: Large Quantity	State Dist Generator; State: Used Oil Activities	rict:			Unknow
and Type: Bad code - U Non No Accessibility: No. Em IAICS Codes: 32411 Petroleum Refine Regulated Waste Activities lazardous Waste Generator Status - Federal ransfer Facility:	ployees: eries al: Large Quantity Unknown	State Dist Generator; State: Used Oil Activities Used Oil Transpo	rict: s rter Activity	Off-Sp	Tsd Date:	Unknow
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and Type: Bad code - U Non No Accessibility: No. Em IAICS Codes: 32411 Petroleum Refine Regulated Waste Activities Bazardous Waste Generator Status - Federa Fransfer Facility: Other Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: Fransporter Activity:	ployees: eries al: Large Quantity Unknown Unknown Unknown Unknown Unknown	Generator; State: Used Oil Activitie: Used Oil Transpo Transporter: Transfer Facil Used Oil Process	s rter Activity Unknown ity: Unknown or and/or	Off-Sp Used Mi	pecification Used Oil Burner: Oil Fuel Marketer Activity arketer who directs shipment f-specification used oil to	
and Type: Bad code - U Non No Accessibility: No. Em IAICS Codes: 32411 Petroleum Refine Regulated Waste Activities dazardous Waste Generator Status - Federal Fransfer Facility: Other Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: Fransporter Activity: SD Activity:	ployees: eries al: Large Quantity Unknown Unknown Unknown Unknown No	State Dist Generator; State: Used Oil Activitie: Used Oil Transporter: Transfer Facil Used Oil Process: Re-refiner Activity	s rter Activity Unknown ity: Unknown or and/or	Off-Sp Used Mi	necification Used Oil Burner: Oil Fuel Marketer Activity arketer who directs shipment	
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FLINT HILLS RESOURCES NORTH POLE REFINRY AKD000850701

Continued...

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
	EPARATOR SLUD		Ompped	Official management metrodo
0	0			0 H040 - INCINERATION
EPA Waste Co	des: F037			
ABSORBENT W	ITH WATER AND	UNUSED PRODUCT.		
0	0			0 H040 - INCINERATION
EPA Waste Co	des: D001, D008			
ABSORBENT A	ND DEBRIS WITH	BROKEN MERCURY THERMOMETE	RS ANDHYDROMETERS.	
0	0			0 H010 - METALS RECOVERY
EPA Waste Co	des: D009			
SPENT PAINT T	HINNER W/ XYLE	NE, TOLUENE, NAPHTHALENES, PA	RAFFINS.	
0	0			0 H061 - FUEL BLENDING
EPA Waste Co	des: D001, F003,	F005		
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PAINT: MINERA	L SPIRITS, NAPH	THA, ZINC OXIDE, 2-BUTOXYETHAN	OL.	
0	L SPIRITS, NAPH 0	THA, ZINC OXIDE, 2-BUTOXYETHAN	OL.	0 H061 - FUEL BLENDING
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0	0 odes: D001	THA, ZINC OXIDE, 2-BUTOXYETHAN Type: Implementer Seq. Numi		0 H061 - FUEL BLENDING Date: 08 MAY 1992
0 EPA Waste Co	odes: D001		per: 1 Receive	20 Edition of the announcement of the second
0 EPA Waste Co Activity Location ther/Previous Site	odes: D001 1: AK Source 9 Name: WILLIAMS	Type: Implementer Seq. Numl	per: 1 Receive	Date: 08 MAY 1992
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Notes: 1/99 NAME CHANGE. SBS ORIGINAL SHOWED TSD INDICATOR BUT 1/99 FORM DOES NOT. POSSIBLE FORMER STORAGE SITE; CLOSED NOW. SBS WASTE CODES K169 & WT02. 1999 BRS LQG. SBS 7/5/00. 2001 BRS LQG, OSE 12/13/01.

Regulated Waste Activities

Transfer Facility:	Unknown	Used Oil Activities			
Other Hazardous Waste Generator Activities		Used Oil Transporter Activity		Off-Specification Used Oil Burner:	No
Importer Activity: Mixed Waste Generator:	Unknown Unknown	Transporter: Transfer Facility:	No No	Used Oil Fuel Marketer Activity	
Transporter Activity: TSD Activity:	No Yes	Used Oil Processor and/or Re-refiner Activity		Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Recycler Activity: Exempt Boiler and/or Industrial Furnace	No	Processor: Refiner:	No No	Marketer who first claims the used oil meets the specifications:	No
Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace Exemption:	Unknown	Underground Injection Control:	No	Destination Facility for Universal Waste:	

^{*} End of Report *

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RCRA COMPLIANCE EVALUATION INSPECTION (CEI)

Facility Name:

Date of Inspection: June 17, 2004

Flint Hills Resources Alaska North Pole Refinery (formerly William Petroleum) 1100 H & H Lane North Pole, AK 99705

Standard Industrial Classification:

2911 - Petroleum Refining

Date of Report: September 30, 2004

Facility EPA ID#:

AKD 00085 0701

Inspection Team Members:

Diane Richardson,

Environmental Protection Specialist

US EPA Region 10

Alaska Operations Office

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Anchorage, Alaska 99513

907-271-6329

Richardson.diane@epa.gov

RCRA Status:

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Environmental Protection Specialist

US EPA Region 10

Oregon Operations Office 811 SW Sixth Avenue Portland, Oregon 97204

503-326-3686

long.bruce@epa.gov

Facility Contacts:

David Guinn, Environmental Manager

Kevin Badker, Refinery Manager

Allen Lasiter, President Flint Hills

(907) 488-0033

Authority/Purpose:

This inspection was carried out under the authority of Section 3007 of RCRA. The United States Environmental Protection Agency (EPA) intended to secure information regarding Flint Hills North Pole Refinery's compliance with the regulations promulgated under the Resource Conservation and Recovery Act (RCRA) and as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA). Specifically, regulations found at 40 CFR Part 260 through 270 and Part 279 for the management, transportation, treatment, storage, and disposal of hazardous waste and used oil as defined under these regulations, was investigated.

Facility Description:

Flint Hills Resources, LP is a Wichita, Kansas-based refining and chemicals company that is wholly owned by Koch Industries, Inc. Flint Hills Resources, through its subsidiary Flint Hills Resources Alaska, owns and operates the North Pole facility. The North Pole facility is a 220,000 barrel-per-day crude oil refinery. The North Pole Refinery was purchased from Williams Petroleum in March 2004, and is Alaska's largest and daily produces, about 70,000 barrels of various petroleum products including gasoline, naphtha, jet fuel, heating oil, diesel fuel, gas-oil and asphalt for supply to local and international markets. About 60 percent of the North Pole Refinery's production consists of jet fuel, which is supplied to airlines and to the U.S. military. The company also owns and operates products terminals in Fairbanks and Anchorage that store and distribute asphalt, fuel oils, diesel, jet fuels, gasoline and naphtha refined at the North Pole Refinery.

Refining operations at the North Pole facility consist of three main processes:

Separation occurs at the beginning of the process and following all of the other conversion and treatment processes. Separation is also used to remove oil from wastewater before it is discharged, and to separate gasoline vapors from the air at truck and rail loading.

Conversion involves three different sub-production processes:

- Cracking
- Combining
- Reforming

Treatment is the process of purifying streams to remove unwanted material.

RCRA Compliance History:

An EPA Compliance Evaluation Inspection in 2003 cited violations of universal waste labeling and dates, hazardous waste labels and dates, and open containers.

A new notification of hazardous waste activity was filed with EPA dated 4/7/04. The new waste stream was K052 from an out of service leaded tank that was cleaned. This was a one-time generation notification.

Following are the findings from this inspection (June 17, 2004):

Hazardous waste Streams

Primary RCRA hazardous waste streams are:

- Heat exchanger Solids K050, which contains lead, nickel and chrome in addition to the petroleum based constituent. Volume varies and is generated once a year during maintenance of the heat exchanges.
- 2) Oil Water Separator sludge K037, contains a verity of contaminants, none of which fail TCLP. This is a large waste stream and is generated throughout the facility, but the largest volume is from the oil water separator and fixed film stripper that treats waste waters from the process. Waste waters are stored in tank number 192.
- 3) Tank bottoms from crude oil storage K169, which is generated once every two to three years. The majority of the tank bottoms are returned to the pipeline. However, some volume of solids will remain in the tanks and it would be necessary to remove only when maintenance on the tanks is necessary.
- 4) Various paints, solvents and aerosol cans. The primary waste code used for the disposal of the solids is F003. The aerosol cans are treated on-site and the paint and other solids are accumulated with solvent, such as acetone and disposed as a hazardous waste fuel (shipped to Emerald Environmental Services in Tacoma for fuel blending).
- 5) At the time of this inspection, Flint Hills was crushing their fluorescent bulbs on-site and managing them as a hazardous waste; D009. Due to the shipping costs, it was not an advantage to Flint Hills to manage the lamps as universal waste.

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Hazardous waste generated by Flint Hills is sent off-site for disposal and is currently being managed and disposed through Philips Environmental Services. The majority of Flint Hills' hazardous waste is going to the Philips Environmental Services facility in Kent Washington.

Manifest Review

A generator who offers for transportation, hazardous waste for offsite treatment, storage, or disposal must prepare a manifest, form 8700–22. The generator must sign the manifest certification by hand; and obtain the handwritten signature of the initial transporter and date the hazardous waste was accepted for transport. In addition, the generator must retain the original copy of the manifest with the hand written signature of the receiving facility's representative and must retained the document for at least three years from the date the waste was accepted by the initial transporter. In addition, a generator of greater than 1000 kilograms of hazardous waste in a calendar month must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter. The following was noted during our review of the manifested shipments that left the facility after EPA's 2003 inspection.

Table 1 is a summary of the sequence of events for each of the three shipments from when the waste left Flint Hills North Pole facility and the manifest with the handwritten signature of the owner or operator of the designated facility was received by Flint Hills.

Table 1						
Manifest Number	04084	03008	03221			
Shipped	03/29/04	10/29/03	08/07/03			
TSDF Rec's Shipment	04/29/04	12/03/03	09/12/03			
Flint Rec's Manifest	05/03/03	12/04/03	09/16/03			
No. of Days	35	36	40			

Each manifest had an LDR notice that accompanied the shipment. No discrepancies were noted.

Maintenance Building No. 209

The maintenance building operates a glass bead blaster. At the time of this inspection there was a 10-gallon container being managed as satellite accumulation. The container was labeled and being managed appropriately. The waste was not leaking, the container was closed and the labeling read satellite accumulation, hazardous waste.

This building also operates a parts washer. At the time of this inspection there was a 10-gallon container labeled as "washer sludge" for the solids out of the parts washer. The container was being managed as satellite accumulation. The container was labeled and being managed appropriately.

In a separate satellite accumulation area was a 55-gallon container labeled as hazardous waste ethylene glycol. In the past, this waste stream has not been hazardous but due to the new ownership of the company, the waste was pending new analysis.

In the same satellite accumulation area as the ethylene glycol was a 20-gallon aerosol can puncturing device and container also being managed as satellite accumulation. There were three empty aerosol cans on top of the puncturing device.

EPA has previously stated that generators can only treat hazardous waste in generator accumulation tanks and containers that are in full compliance with 40 CFR 265 Subparts J and I (51 FR 10145, see page 10168). The requirement under 40 CFR 265 Subparts J and I are designed to ensure that the integrity of the tanks and containers is not breached. EPA considers treatment in accumulation tanks and containers by generators to pose the same level of risk, as would treatment by permitted facilities in similar tanks and containers. Satellite containers are exempt from compliance with the full requirements under Subpart I (40 CFR 262.34(c)). At a minimum for the container being used to treat the aerosol containers must comply with Subpart I (container management) under Part 265, the container must have an accumulation start date and be marked with the words "Hazardous Waste." In addition, there needs to be weekly inspections and the personnel handling the waste must be trained. The container was not dated with an accumulation start date on the day of this inspection. The regulations at 40 CFR 262.34(a) state that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that the waste is placed in containers.

At the time of this inspection, there were three aerosol cans sitting on top of the puncturing device container. EPA has stated that aerosol cans that have not been punctured are considered to be a hazardous waste (D003).

There were also two 55-gallon containers of used oil in this area labeled appropriately.

Building #249

Lead acid batteries in this building are recycled.

The satellite accumulation area had three 55-gallon containers labeled as hazardous waste. One container was for crushing fluorescent lamps, one was a container for puncturing aerosol cans, and the third was labeled as hazardous waste paint waste. Both the lamp crusher and the aerosol can container are considered treatment under RCRA.

The containers were not full at the time of this inspection. The total amount of waste accumulated at this time was below the 55-gallon limit for satellite accumulation areas. EPA has stated that generators can only treat hazardous waste in generator accumulation tanks and containers that are in full compliance with 40 CFR 265 Subparts J and I (51 FR 10145, see page 10168). The requirement under 40 CFR 265 Subparts J and I are designed to ensure that the integrity of the tanks and containers is not breached.

EPA considers treatment in accumulation tanks and containers by generators to pose the same level of risk, as would treatment by permitted facilities in similar tanks and containers. Satellite containers are exempt from compliance with the full requirements under Subpart I (40 CFR 262.34(c)). At a minimum for the containers being used to treat the aerosol cans and fluorescent lamps to comply with Subpart I (container management) under Part 265, the container must have an accumulation start date and be marked with the words "Hazardous Waste." In addition, there needs to be weekly inspections and the personnel handling the waste must be trained. The containers were not dated with an accumulation start date on the day of this inspection.

There was also a 55-gallon container labeled as universal waste bulbs dated 4/1/04. The container was labeled and being managed appropriately.

Lab

The satellite accumulation area inside the lab contained a small jug of spent chemicals from the chemical oxygen demand (COD) test. This solution is hazardous for benzene (D018). The central accumulation area outside the lab is in a yellow tote. Inside the tote at the time of this inspection was a 5-gallon container labeled for mercury waste. The container was empty and no accumulation start date on the container at the time of this inspection.

90-day Outside accumulation area

A generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that, the waste is placed in containers and the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container; and while being accumulated on-site, each container is labeled or marked clearly with the words, "Hazardous Waste."

The containers observed in this area at the time of this inspection were:

- five 55-gallon containers labeled as non-hazardous sandblast grit
- a 15-gallon container labeled as "exit sign with tridium" dated 5/3/04

- a 55-gallon container labeled as hazardous waste misc. sludge (K050, F037) dated 6/17/04 (The container wasn't full at the time of this inspection but fills quickly so is managed as a less than 90-day accumulation area.).
- a large tote labeled as hazardous waste spent filters dated 6/17/04

There were lots of empty containers in this area as well.

Fixed Film Stripper and Lagoons:

Hazardous waste waters generated at this facility typically are hazardous for benzene (D018) that comes from the desalting process. Before the waste water goes into the lagoons, 2/3 of the waste waters go through the bio treatment system and one-third of the waste water goes through the waste water system. Each stream has to be below .5ppm for benzene for either to go to the lagoons. If one stream comes back above .5ppm and one comes back below .5ppm, neither stream will go to the lagoon, instead they will both returned back through the system and testing again until both meet the .5ppm limit.

Closing/Summary:

Both Mr. Guinn and Mr. Lasiter represented Flint Hills during the out briefing. The EPA inspection team discussed the rules about generator treatment being managed in a less than 90-day area as opposed to satellite accumulation. This meant that container used to treat hazardous waste must be in compliance with the standards identified for generators containers found at 40 CFR 262.34.

The EPA inspection team also discussed aerosol cans as being a hazardous waste for reactivity (D003) and therefore they needed to be managed in containers that were closed unless waste was being added or removed and the container was labeled as hazardous waste as required at 40 CFR 262.34(a)(3).

This inspection ended at approximately 3:35pm local time.

Recommendations:

Williams operates two small lagoons for capturing waste water from the film stripper and oil water separators throughout the facility. The wastewater, which follows at an average rate of 65-gallons per minute, flows through a series of treatment devices such as a film stripper and the water, then flows in the lagoons before it is discharged to the City of North Pole. Williams monitors the effluent from the stripper only to determine the benzene and sulfalene content. No other hazards are monitored. Further visits by EPA should include an extensive sample collection of the effluent entering the pound to determine if any hazardous waste is being disposed into the ponds.